

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP, INC., a New
Jersey corporation, d/b/a “MY FOREX
FUNDS”; TRADERS GLOBAL GROUP
INC., a Canadian business organization; and
MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808

**MOTION FOR ADMISSION
PRO HAC VICE**

Pursuant to Rule 101.1(c)(1) of the Local Rules of the United States District Court for the District of New Jersey, I, Michael V. Rella, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Thomas DeFranco
DAVIS WRIGHT TREMAINE LLP
1301 K Street, Suite 500 East
Washington, DC 20005
Tel: (202) 220-1928
Fax: (202) 973-4499
Email: TomDeFranco@dwt.com

Dated: September 21, 2023
New York, New York

DAVIS WRIGHT TREMAINE LLP

By: /s/ Michael V. Rella

Michael V. Rella
1251 Avenue of the Americas, 21st Floor
New York, New York 10020
Phone: (212) 880-3973
Fax: (212) 489-8340
Email: MichaelRella@dwt.com

Attorneys for Non-Party Movant Stripe, Inc.

**UNITED STATES DISTRICT COURT
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TRADERS GLOBAL GROUP, INC., a New
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Defendants.

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**CERTIFICATION OF
MICHAEL V. RELLA IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC
VICE**

I, MICHAEL V. RELLA, a member of the bar of this Court, declare as follows pursuant to
28 U.S.C. § 1746:

1. I am an attorney with Davis Wright Tremaine LLP, of counsel for non-party movant
Stripe, Inc. in this matter. I make this certification based on my personal knowledge of the facts
set forth herein and in support of the motion to admit Thomas DeFranco *pro hac vice* to
represent non-party movant Stripe, Inc.

2. I am a member in good standing of the bars of the States of New Jersey and New York. I
am also a member in good standing of the bar of this Court.

3. Thomas DeFranco is a member in good standing of the bar(s) of the District of Columbia
and New York. There are no pending disciplinary proceedings against Mr. DeFranco in any
state or federal court, and no discipline has previously been imposed on Mr. DeFranco in any
jurisdiction. In accordance with the Local Rules, a certified statement of Mr. DeFranco is
attached as “Exhibit A.”

4. I respectfully submit a proposed Order granting the admission of Thomas DeFranco, *pro hac vice*, attached as “Exhibit B”, hereto.

WHEREFORE, it is respectfully requested that the motion to admit Thomas DeFranco *pro hac vice* to represent non-party movant Stripe, Inc. in the above-captioned matter be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 21, 2023
New York, New York

/s/ Michael V. Rella
Michael V. Rella

EXHIBIT A

DECLARATION OF THOMAS DEFRANCO

I, Thomas DeFranco, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am member in good standing of the bar(s) of the District of Columbia and New York.
2. I was admitted to the bar(s) of the District of Columbia on June 16, 2019 and New York March 16, 2016. The address of the office maintaining the roll of the members of the bar(s) is: DC Bar, 901 4th St., NW, Washington DC, 20001, and Supreme Court of the State of New York, Appellate Division, Second Dept., 335 Adams Street, Brooklyn, NY 11201.
3. There are no pending disciplinary proceedings against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 21, 2023

/s/ Thomas DeFranco
Thomas DeFranco

EXHIBIT B

**UNITED STATES DISTRICT COURT
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INC., a Canadian business organization; and
MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808

**[PROPOSED] ORDER FOR ADMISSION
PRO HAC VICE**

Upon the motion of Michael V. Rella, attorney for non-party movant Stripe, Inc and said
sponsor attorney’s declaration in support;

IT IS HEREBY ORDERED that

Thomas DeFranco
DAVIS WRIGHT TREMAINE LLP
1301 K Street, Suite 500 East
Washington, DC 20005
Tel: (202) 220-1928
Fax: (202) 973-4499
Email: TomDeFranco@dwt.com

be admitted to practice *pro hac vice* in the above-captioned case. All attorneys appearing before
this Court are subject to the Local Rules of this Court, including the Rules governing discipline
of attorneys;

IT IS FURTHER ORDERED that Thomas DeFranco pay the annual fee to the New
Jersey Lawyers’ Fund for Client Protection in accordance with Local Civil Rule 101.1(c)(2) and
New Jersey Court Rule 1:28-2(a);

IT IS FURTHER ORDERED that Thomas DeFranco pay the sum of \$150.00 to the clerk of the United States District Court in accordance with Local Civil Rule 101(c)(3);

IT IS FURTHER ORDERED that Thomas DeFranco may file a request with the Clerk of the Court, the form of which is available on the Court's website, for *pro hac vice* counsel to receive electronic notifications in this matter.

So Ordered,

Hon. Zahid N. Quraishi

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2023, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices. I also certify that I have caused copies of the aforementioned document to be served via first class mail, postage prepaid, upon all non-CM/ECF participants.

/s/ Michael v. Rella
Michael V. Rella